

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE:

CHAPTER 7

BEVERLYON PAYNE

CASE NO: 21-51228

Debtor

JUDGE ALAN M. KOSCHIK

MOTION FOR TURNOVER ORDER

Now comes Marc P. Gertz, the duly appointed and acting Trustee in the above captioned matter and pursuant to 11 U.S.C. §542 moves the Court for an Order requiring the debtor, Beverlyon Payne to turnover to the Trustee her 2013 Dodge Journey, as same is property of the bankruptcy estate pursuant to 11 U.S.C. §541.

WHEREFORE, Trustee prays that the Court issue an Order directing and requiring Beverlyon Payne, Debtor, to turnover to the Trustee her 2013 Dodge Journey forthwith, and further prays that said order be issued without any further hearing herein unless any creditor or interested party requests such hearing and/or objects to same within twenty-one (21) days of receipt of this Motion.

Respectfully submitted,

/s/ Marc P. Gertz

Marc P. Gertz, #0003808

Chapter 7 Trustee

Gertz & Rosen, Ltd.

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[mpgertz@gertzrosen.com](mailto:mpgertz@gertzrosen.com)

CERTIFICATE OF SERVICE

I certify that on December 13, 2021, a true and correct copy of **Motion for Turnover Order** was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Werner Mendenhall on behalf of Debtor at [warner@warnermendenhall.com](mailto:warner@warnermendenhall.com)

US Trustee Office

And by regular U.S. mail, postage paid, on:

Beverlyon Payne at 770 E. Buchtel Ave., #218, Akron OH 44305

/s/ Marc P. Gertz

Marc P. Gertz, #0003808

Chapter 7 Trustee

## NOTICE OF MOTION FOR TURNOVER ORDER

Marc P. Gertz, Trustee has filed a motion for turnover order with the court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to allow the Motion, or if you want the court to consider your views on the motion, then on or before January 3, 2021, you or your attorney must:

File with the court a written request for a hearing at:

**Clerk of Courts  
U.S. Bankruptcy Court  
2 South Main Street  
Akron, Ohio 44308**

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

**Marc P. Gertz, Trustee  
11 S. Forge St.  
Akron, Ohio 44304**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.